1 THE HONORABLE RONALD B. LEIGHTON 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT TACOMA JEFF BUTLER and BRYCE MEYER, individually and as the representatives of all 11 persons similarly situated, No.: 3:14-cv-05305 RBL 12 Plaintiffs, STIPULATED MOTION FOR ORDER EXTENDING DATES FOR CASE 13 **SCHEDULE** v. AMERICAN FAMILY MUTUAL INSURANCE COMPANY and AMERICAN STANDARD INSURANCE COMPANY OF WISCONSIN, foreign insurers, 16 Defendants. 17 18 I. STIPULATION AND REASONS FOR REQUESTED **EXTENSION** 19 Pursuant to LCR 10(g), plaintiff Bryce Meyer, and defendants American Family 20 Mutual Insurance Company and American Standard Insurance Company of Wisconsin, 21 through their respective counsel, stipulate, agree and jointly move the court to extend the 22 dates in the order setting dates for case schedule. 23 The parties have completed substantial discovery, and plaintiff has now filed his 24 motion for class certification. Plaintiff relies upon expert opinions that were provided in the materials supporting the motion for class certification. Defendants have requested written 26

STIPULATED MOTION FOR ORDER EXTENDING DATES FOR CASE SCHEDULE
No.: 3:14-cv-05305 RBL

Page 1 Bullivant|Houser|Bailey PC

300 Pioneer Tower 888 SW Fifth Avenue Portland, Oregon 97204-2089 Telephone: 503.228.6351 discover related to the expert opinions and anticipate expert depositions before responding to plaintiff's motion for class certification. Plaintiff expects to need similar expert discovery following defendants' opposition to plaintiff's motion for class certification. The parties request the following changes to the case management schedule:

Defendants' deadline to complete expert discovery related to class certification	January 30, 2015
Deadline to file Defendants' opposition to motion for class certification	February 27, 2015
Plaintiff's deadline to complete expert discovery related to class certification	April 27, 2015
Deadline to file Plaintiff's reply in support of motion for class certification	May 29, 2015

DATED: December 23, 2014

No.: 3:14-cv-05305 RBL

BULLIVANT HOUSER BAILEY PC	LAW OFFICES OF
	STEPHEN M. HANSEN, P.S.
s/ John A. Bennett	
s/ Daniel R. Bentson .	s/Stephen M. Hansen (per email approval)
John A. Bennett, WSBA #33214	Stephen M. Hansen, WSBA #15624
Daniel R. Bentson, WSBA 36825	The Law Offices of
Bullivant Houser Bailey PC	Stephen M. Hansen, P.S.
1700 Seventh Avenue. Suite 1810	1821 Dock Street, Suite 103
Seattle, Washington 98101-1397	Tacoma, Washington 98402
Telephone: 206.292.8930	Telephone: 253.302.5955
Attorneys for Defendants	Attorneys for Plaintiffs
 	

IT IS SO ORDERED

DATED this 29th day of December, 2014.

RONALD B. LEIGHTON

UNITED STATES DISTRICT JUDGE

STIPULATED MOTION FOR ORDER EXTENDING DATES FOR CASE SCHEDULE

Page 2

Bullivant|Houser|Bailey PC

888 SW Fifth Avenue Portland, Oregon 97204-2089 Telephone: 503.228.6351

1	Submitted by:	
2	BULLIVANT HOUSER BAILEY PC	
3	D / I I A D	
4	By s/ John A. Bennett s/ Daniel R. Bentson	
5	John A. Bennett, WSBA No. 33214 E-Mail: john.bennett@bullivant.com	
6	Daniel R. Bentson, WSBA No. 36825	
7	E-Mail: dan.bentson@bullivant.com Bullivant Houser Bailey, PC	
8	1700 Seventh Avenue, Suite 1810 Seattle, WA 98101-1820	
	206.521.6420	
9	Attorneys for Defendants	
10	THE LAW OFFICES OF STEPHEN M. HANSEN, P.S	
11		
12	By s/ Stephen M. Hansen (per email approval) s/ Debra Brewer Hayes (per email approval)	
13	s/ Scott P. Nealey (per email approval)	_
14	Stephen M. Hansen, WSBA 15642 E-Mail: steve@stephenmhansenlaw.com	
15	The Law Offices of Stephen M. Hansen, P.S.	
16	1821 Dock Street, Suite 103	
17	Tacoma, WA 98402 253.302.5955	
18	Debra Brewer Hayes (pro hac vice)	
19	E-Mail: dhayes@dhayeslaw.com	
20	The Hayes Law Firm, P. C. 700 Rockmead, Ste. 210	
	Kingwood, TX 77339	
21	Scott P. Nealey (pro hac vice)	
22	E-Mail: snealey@nealeylaw.com Law Office of Scott P. Nealey	
23	71 Stevenson Street, Suite 400 San Francisco, CA 94105	
24		
25	Attorneys for Plaintiffs	
26		

300 Pioneer Tower 888 SW Fifth Avenue Portland, Oregon 97204-2089 Telephone: 503.228.6351